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UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

ORACLE USA, INC.; ORACLE AMERICA,
 INC.; and ORACLE INTERNATIONAL
 CORPORATION,

Plaintiff,

v.

RIMINI STREET, INC. and SETH RAVIN,
 Defendants.

And Related Cases

Case No. 2:14-cv-01699-LRH-CWH

RIMINI STREET, INC.,

Plaintiff,

v.

ORACLE INTERNATIONAL CORPORATION,
 Defendant.

Case No. 2:10-cv-0106-LRH-VCF

**ORACLE'S MOTION FOR
 REASSIGNMENT OF MATTER TO
 MAGISTRATE JUDGE PEGGY A.
 LEEN**

1 ORACLE AMERICA, INC., *et al.*,
2 Counterclaimants,
3 v.
4 RIMINI STREET, INC., *et al.*,
5 Counterdefendants.
6
7 **Case No. 3:16-CV-00543-LRH-CWH**
8 COLBECK CAPITAL MANAGEMENT,
9 Third-Party Movant,
10 v.
11 ORACLE INTERNATIONAL CORPORATION
12 and ORACLE AMERICA, INC.,
13 Respondents.
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NOTICE OF MOTION AND MOTION

Pursuant to Federal Rule of Civil Procedure 7(b) and Local Rule 7-2, Plaintiff Oracle USA, Inc., Oracle America, Inc. and Oracle International Corporation (collectively “Oracle”) respectfully move the Court for an order reassigning this matter (“*Rimini I*”) to Magistrate Judge Peggy A. Leen.

MEMORANDUM OF POINTS AND AUTHORITIES

Oracle refers the Court to its Motion for Reassignment of Matters to Magistrate Judge Peggy A. Leen filed in *Rimini Street, Inc., v. Oracle International Corp.*, Case No. 2:14-cv-01699-LRH-CWH (“*Rimini II*”) and attached here as Exhibit 1. For all of the reasons stated in Exhibit 1, Oracle respectfully requests that the Court reassign Judge Leen to this matter (“*Rimini I*”) because reassignment would promote judicial economy and diminish the likelihood of inconsistent results.

Moreover, there are several additional grounds supporting Oracle’s request for reassignment of this matter to Judge Leen. First, the Court has already found that *Rimini I* and *Rimini II* are related cases and that judicial economy would be served by assigning both cases to Your Honor and Magistrate Judge Leen. *See Rimini II*, ECF No. 52. Second, all of the reasons outlined in Exhibit 1 apply equally, if not more so, to *Rimini I*: (i) Judge Leen has even more extensive experience adjudicating *Rimini I* which has been pending since 2010, and (ii) the current magistrate judge has not made any rulings in this case since Judge Leen’s temporary recusal. Third, there are still unresolved issues in *Rimini I* which may necessitate enforcement or other post-judgment proceedings. *See Rimini I*, ECF Nos. 1049 (granting Oracle’s motion for permanent injunction and awarding Oracle prejudgment interest and attorneys’ fees); 1072 (temporarily staying injunction pending a ruling on Rimini’s motion for a stay).

For these reasons, Oracle respectfully requests that *Rimini I* be reassigned to Judge Leen.

1 DATED: October 19, 2016

MORGAN, LEWIS & BOCKIUS LLP

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3 By: /s/ Thomas S. Hixson

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5 Attorneys for Plaintiffs Oracle USA, Inc.,
6 Oracle America, Inc., and Oracle International
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CERTIFICATE OF SERVICE

I certify that on October 18, 2016, I electronically transmitted the foregoing ORACLE'S MOTION FOR REASSIGNMENT OF MATTER TO JUDGE PEGGY A. LEEN AND MEMORANDUM OF POINTS AND AUTHORITIES together with Exhibit 1 to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all counsel in this matter; all counsel are CM/ECF registrants.

DATED: October 19, 2016

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Thomas S. Hixson

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Corp.